

The Financial Oversight and Management
Board for Puerto Rico

as representative of

The commonwealth of Puerto Rico et al;

Debtors

Promesa Title III

No. 17 BK 3283-LTS

Re: ECF No. 6494

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CLERK OF COURT
DISTRICT COURT
SAN JUAN, P.R.

Motion in reply to position of the C.L.A. of P.R. in case DTP2017-0229

The plaintiff appears in his own right and requests:

1- We believed that the misrepresentations of the legal language and the pitfalls make us weaker just they were here locally. But no, I see that they move to all kinds of scenario the unfortunate language where they induce to the court to decide contrary to the established and adopted guidelines. I explain:

2- How do I know what cheats they are and that way they abuse a lot here, strategically present this same petition at the local level asking the court to de-paralyze this payment in this case. They argued that the article III-Q of promise on January, 23, 2019, was enlisted to make flexible and expedite the de-paralyze of cases which did not affect in any way my rights to be able to recover

3- Now and at the same time, they appear before this court alleging otherwise. They claim that I want preferential treatment, trying to change the promise. When in fact already this same subject this court has raised the paralysis in other cases to allow payments and to continue the civil processes in other cases. We do not understand why it is that my claim has to be taken to speculation that I want preferences and/or change promises. In fact, this court entrusted article III-Q and relaxed the decriminalization or requests in that regard, we do not understand why today it is a state that does not want me as a citizen to benefit from these provisions that guarantee me the court.

4- I accompany as a sample of the contradiction to which we are kept by the citizens in relation to the promise and their course in this court, the motion that at the local level they presented talking about the rights that they guarantee me, but nevertheless, here they advocate otherwise

5- However, after 23 January, 2019, the Boston circuit declared the board of fiscal control unconstitutional, to which I am subject under article III-Q, to give notice of my interest in which the paralysis is lifted in a term of 15 day and to meet and confer with the state representatives before submitting the requests to relieve the paralysis.

6- However, I did it a long time ago the board received it and they have never responded. Nor in my state of confinement can I meet and less to confer with any representative of the state in any of my cases, because I am prisoner unless the intervention of this honorable court, anyway, is a futile and ultra vires exercise to do so because in the end I am forced to exhaust a remedy before an entity is unconstitutional and therefore illegal.

7- In this case, by granting the defendant to pay the debt of two thousand dollars, it will result in a complete resolution of the problems, there is no interference with the bankruptcy case, it does not involve debtors as fiduciaries, the interest of others is not harmed creditors, only involves the plaintiff, as it has been arranged in Soraxx Indus. v. Tricomponent Prods. corp., 907 F.2d 1280, 1286, 2^d Cir. 1990".

For everything that is requested is not declared does not take place the request of the state and is ordered with the payment in this case DDP2014-0329

Gerald Santana Barer
50 arr-5 unit 4-501 edit 3-J
Ind. health, Bay P.R. 00261